EXHIBIT A

REDACTED VERSION PROPOSED TO BE FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

MARSHALL DIVISION

OPULENT TREASURES, INC.,

CIVIL ACTION NO.

Plaintiff,

2:22-cv-02616-SVW-JC

VS.

YA YA CREATIONS, INC.,

Defendants.

REMOTE 30(B)(6) DEPOSITION OF YAYA CREATIONS, INC. BY

AND THROUGH MITCHELL SU

THURSDAY, JUNE 9, 2022, 10:03 A.M.

(THIS TRANSCRIPT IS DESIGNATED AS CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER)

Reported remotely by Harry Alan Palter, California CSR No. 7708, a Certified Stenographic Reporter

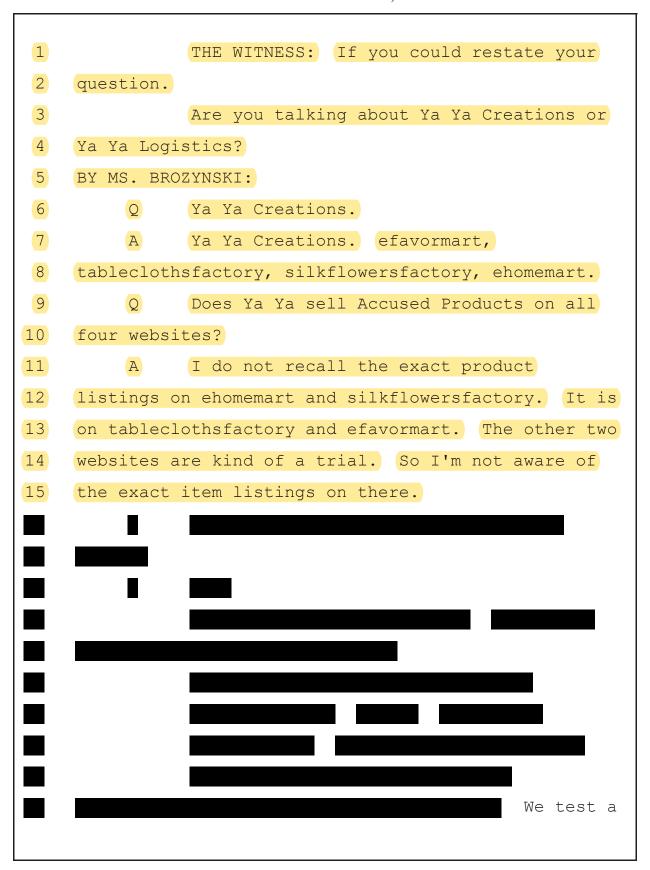
1 question regarding how Ya Ya is compensating its 2 lawyers? 3 Α Yes. How long Ya Ya has been in existence? Since we've changed to "Inc." That was 5 6 back in approximately 2006. 7 So Ya Ya Creations, Inc., was formed sometime in 2006? 8 9 Α Yes. And before 2006, was there another entity 10 11 that you owned? 12 Yes. It was Ya Ya Creations -- I want to say it's "LLC." Yeah. I don't remember the exact, 13 but I think it was "LLC" before that. 14 15 And how long did you have that entity --Q the LLC? 16 17 I don't remember. A 18 So since at least 2006, it's Ya Ya 0 Creations Inc.; correct? 19 20 Α Yes. 21 Who are the owners of Ya Ya Creations, 22 Inc.? 23 Just Mitchell Su. A 24 You are 100 percent owner of 25 Ya Ya Crea --

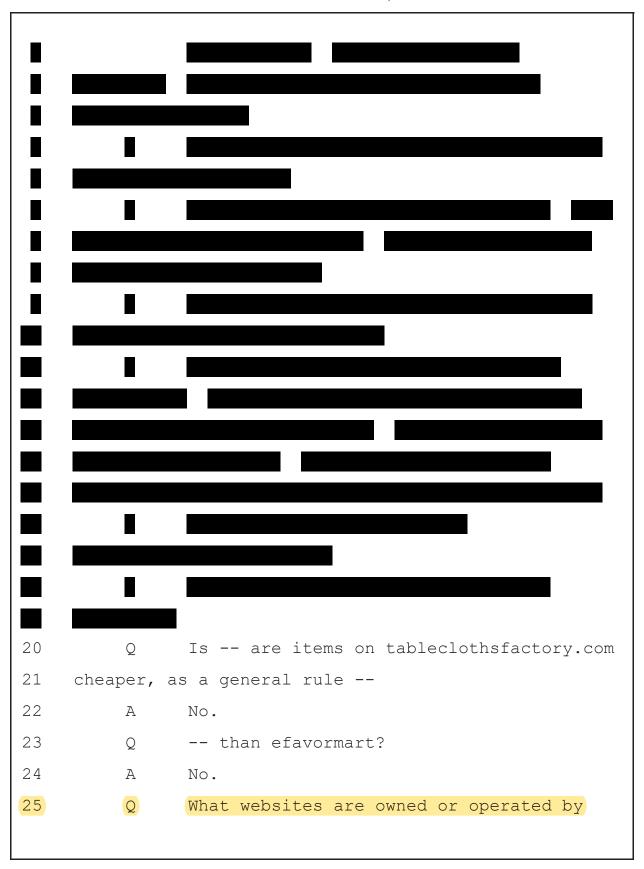
1	A	Yes.
2		MR. KARISH: Let her finish the question.
3	BY MS. BRO	DZYNSKI:
4	Q	Is Ya Ya Creations "S" corporation or "C"
5	corporation	on?
6	А	"S" corporation.
7	Q	Have you ever signed Nondisclosure
8	Agreement	on behalf of your business?
9	А	Yes.
10	Q	When and where under what
11	circumsta	nces?
12	A	Oftentimes, we would Ah. I think the
13	last time	we signed it was back in 2020. It was to
14	review and	other company's records.
15	Q	What company's records?
16	А	I it's a nondisclosure, so I can't
17	tell you.	But it was to an M & A transaction.
18	Q	Did the M & A transaction ever came
19	did it eve	er come to fruition?
20	A	No.
21	Q	You never acquired that company?
22	A	No.
23	Q	Was it that you were going to acquire
24	that compa	any, or the company was going to acquire
25	you?	

1	chain.
2	Q Gotcha.
3	A It's not a vendor it's how yeah.
4	Q In other words, you are sup supplying
5	to your trading partner infringing products. That's
6	what you are telling me?
7	MR. KARISH: Objection. Argumentative.
8	Misstates facts not in evidence.
9	
	THE WITNESS: We are supplying the
10	product. We are not infringing.
11	BY MS. BROZYNSKI:
12	You are supplying Accused Products to
13	your trading partners; correct?
14	A We're selling the product through these
15	channels.
16	You are selling Accused Products to your
17	trading partners; correct?
18	These are channels. I mean I don't
19	know why it's named "trading partners." [It's just a
20	field name. These are just selling like,
21	efavormart, it's the website. It's the channel.
22	Q Okay. Because efavormart and ehomemart
23	is your websites, basically; right?
24	A Yes.
25	Q Okay. But Balsa Circle has website you

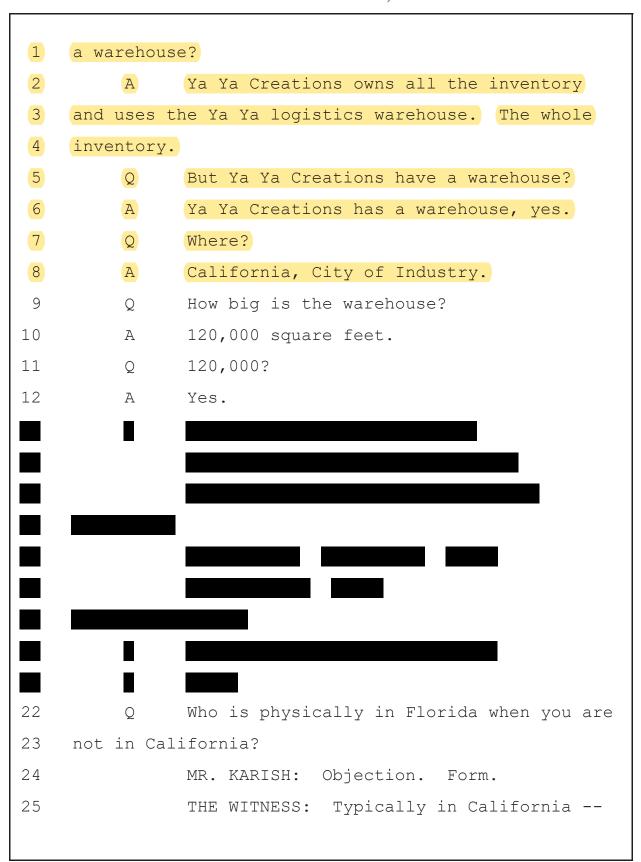
1	A Yes.
2	Q And by the way, I never asked you: What
3	is your role formal title with Ya Ya Creations?
4	A I guess it's CEO.
5	You guess or you are CEO?
6	A I don't know how many roles I hold, but
7	CEO is one of them.
8	Q Do you have any other roles than CEO?
9	Officially on our HR, I'm named the
10	janitor.
11	Q You you you clean desks, too?
12	A I clean up every I clean up after
13	everyone.
14	Q I'm sorry.
15	Who is Balsa Circle, again?
16	A That's a customer.
17	Q A trading partner?
18	A That's a customer.
19	Q Balsa Circle is listed on Exhibit 16, the
20	very first two entries, under column of "Trading
21	Partner"; is that correct?
22	A That's a channel. That's the channel
23	they are coming in through our system. We just name
24	it "Balsa Circle."
25	Q No. You just named it "Trading

h	
écor that	
you know of about Opulent?	
epresents	
with Lamps	
pany.	
Should be	
f the	
perates	





1		stics, Inc.?
2	A	Nothing.
3	Q	Ya Ya Logistics, Inc., doesn't have a
4	website?	
5	A	Does not.
6	Q	And you said it's a shipping company?
7	A	Yes.
8	Q	Does it have a warehouse?
9	A	Yes.
10	Q	How big?
11	A	200,000 square feet.
12	Q	Why location in Florida?
13	A	Operationally, it makes sense.
14	Q	How so?
15	A	California and Florida east and west.
16	Q	So you basically cover all all markets
17	that's	that's the goal?
18		MR. KARISH: Objection. Form.
19		THE WITNESS: The goal is to ship the
20	order fast	ter to the customer.
21	BY MS. BRO	DZYNSKI:
22	Q	The shipments that come from H.K. Jayden
23	and Win Be	est from Asia, where do they go?
24	A	They can go to either warehouse.
25	Q	So Ya Ya Creations also have also has



1 have syndicated to Kmart, but that's not what we --2 we signed up for. 3 But you have no recollection when you 4 start selling products on Sears -- Accused Products? 5 (No audible response). 6 What about Walmart? Do you still sell 0 7 Accused Products on Walmart? 8 Α Yes. 9 You didn't pull them; right? Q 10 Α No. 11 Do you still sell Accused Products on Q 12 eBay? Yes. 13 Α

2	Q	What's the percentage of products
3	Accused Pr	oducts shipped to the warehouse in
4	California	versus warehouse in Florida?
5	A	Again, I there's no way for me to give
6	you that.	This is a history of all five years?
7	Q	You don't know?
8	A	I don't know.
9	Q	Do you know of any instances of consumers
10	being conf	used as to the source of Accused Products?
11	А	No.
12	Q	Are you aware of any correspondence from
13	consumers	being confused about the source of the
14	Accused Products?	
15	А	No.
16	Q	In your organization, who would be on the
17	receiving	end of these complaints, if they ever
18	came?	
19	A	Our customer service department.
20	Q	And what does that customer service
21	department	consist of, and who is at the top of that
22	department	?
23		MR. KARISH: Objection. Form.
24		THE WITNESS: It could be consisting of
25	customer s	ervice reps, and it would be under a

1	CERTIFIED SHORTHAND REPORTER'S CERTIFICATE
2	
3	I, Harry A. Palter, CSR No. 7708, Certified
4	Shorthand Reporter for the State of California, do
5	hereby certify: That prior to being examined, the
6	witness in the foregoing deposition, Mitchell Su, was
7	duly sworn to testify the truth, the whole truth, and
8	nothing but the truth; that said deposition was taken
9	down by me stenographically and remotely in a readable
10	format at the time and place therein named; and that the
11	same is a true, correct, and complete transcript of said
12	deposition.
13	Before completion of the deposition, review
14	of the transcript [] was [X] was not requested. If
15	requested, any changes made by the deponent (and
16	provided to the reporter) during the period allowed, are
17	appended hereto.
18	I further certify that I am not interested in
19	the outcome of the action. In witness whereof, I have
20	hereunto subscribed my name.
21	Dated: 15th day of June, 2022
22	
23	
24	Harry Con
25	HARRY ALAN PALTER, CSR No. 7708